

IN THE UNITED STATES DISTRICT COURT
OF THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

SUNTRUST MORTGAGE, INC.,
a Virginia corporation,

Plaintiff,

v.

LCMG, INC.,
a South Carolina corporation,

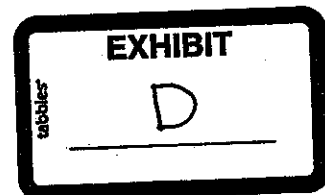
Defendant.

Civil Action No.: 3:11-cv-565-MHL

DECLARATION OF TINA KADAS

I, Tina Kadas, in accordance with 28 U.S.C. § 1746, do hereby declare:

1. I am over the age of 18 years and competent to make this declaration.
2. I am Group Vice President of the Third Party Originator Recovery Group for SunTrust Mortgage ("SunTrust").
3. Third party originators (TPOs) are either mortgage brokers that originate loans for SunTrust or correspondent lenders who sell loans to SunTrust.
4. SunTrust commonly sells loans associated with TPOs to the Federal National Mortgage Association ("Fannie Mae") or other secondary investors.
5. In the regular performance of my job duties, I am familiar with business records maintained by SunTrust relating to the repurchase requests submitted by Fannie Mae and subsequent actions against third party originators.
6. These records – which include data compilations, electronically imaged documents, and others – are made at or near the time by, or from information provided by, persons with knowledge of the activity and transactions reflected in such records.



7. In connection with making this declaration, I have acquired personal knowledge of the matters stated herein by personally examining applicable business records.

8. SunTrust has 57 active cases against TPOs, seeking either repurchase of loans by a TPO or indemnification based on losses connected with a TPO's loans.

9. Between 2006 and 2011, Fannie Mae demanded that SunTrust repurchase approximately 13,729 loans.

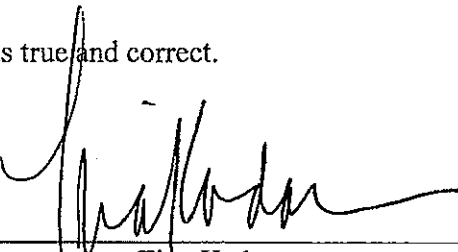
10. Nearly half of those repurchase demands – approximately 6,152 – were received in calendar year 2011 alone.

11. Upon receiving a repurchase request, SunTrust typically conducts an investigation of the grounds for repurchase, which may include a fraud investigation.

12. Since 2005, United Guaranty has insured approximately 24,707 separate mortgage loans funded or purchased by SunTrust pursuant to the master policy between United Guaranty and SunTrust.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 23rd, 2012:



Tina Kadas